

REMARKS

Claims 1, 2, 7, 12, 13, 18, 23, 28, 33, and 38 are amended. Claims 1-45 are now pending in the application. The amendments to the claims as indicated herein do not add any new matter to this application. Each issue raised in the Office Action mailed December 2, 2008 is addressed hereinafter.

Claims 1-45 are rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Underwood et al (US 6,697,825) in view of Bowman, Michel K. (US 2003/0058277 A1). The rejection is respectfully traversed.

Claim 2 recites “receiving one or more business objects that each define a user action”. Claims 1, 12, 13, 23, and 33 recite similar subject matter. In rejecting this portion of Claim 2, the Office Action (page 4) cited various sections of Underwood, but without making any explanatory remarks. The Supreme Court recently held that a rejection under 35 U.S.C. §103 requires the clear articulation of the reasons why the claimed invention would have been obvious to one of ordinary skill in the art (*KSR International Co. v. Teleflex, Inc.*, 550 U.S. \_\_\_, 82 USPQ2d 1385, 1396 (2007) (emphasis added)). This requirement has not been met. Citing various sections of Underwood without making any explanatory remarks is not “clear articulation”. Therefore, the Office Action fails to state a *prima facie* case of unpatentability.

The Office Action reproduces Office form language relating to the factual inquiries that were first stated in *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966). However, the Office Action fails to establish that each of the *Graham* factual inquiries actually have been performed, and fails to state the complete outcome of the inquiries. For example, the examiner must provide evidence which as a whole shows that the legal determination sought to be proved (i.e. that the reference teachings establish a *prima facie* case of obviousness) is more probable than not (M.P.E.P §2142). The evidence provided by the Examiner does not include adequate responses to the factual inquiries described in *Graham*. For example, the Office Action fails to state the level of ordinary skill in the relevant art. The Office Action fails to identify the differences between the claimed invention and the prior art.

In particular, in rejecting the claimed step of “receiving one or more business objects that each define a user action”, the Office Action (page 4) appears to rely upon Underwood’s predefined site definitions (templates) which are categorized by a specific business type within a specific industry solution. Underwood’s templates are described as comprising generic structures, content, and embedded applications for generating a web site template, where that template is to be later customized by what Underwood describes as an end-user (Underwood, bottom of column 13). That end-user would select an industry type and a specific business type to be associated with a new template web site. Examples of an industry type are “arts and entertainment”, and examples of a business type are “acts” (column 14).

Underwood’s “businesses types” cannot correspond to the claimed “business objects”. Underwood’s predefined site definitions (or templates) do not “define” anything and have no connection to “a user action”, as claimed. Underwood’s “generic structures, content, and embedded applications” also do not define a user action, as claimed. For at least this reason, claim 2 is allowable over Underwood.

Claim 2 also recites “invoking a controller that is communicatively coupled to one or more actions, widgets, and panels”. Claims 1, 12, 13, 23, and 33 recite similar subject matter. The claimed “actions” are distinct from the claimed “user actions” discussed above. In rejecting the claimed “actions” and “panels”, the Office Action (page 4) relies on Underwood’s column 41, lines 14-36, without any explanatory or clarifying remarks. The cited portions of Underwood do not describe the claimed actions or panels and the Office Action states no evidence supporting a contention that Underwood discloses the claimed actions or panels. For at least this reason, the Office Action fails to establish a *prima facie* case of unpatentability.

Underwood does not contain any equivalent for either the claimed actions or panels. The cited section describes Underwood’s Site Definer and how it generates a web page for display on a user’s browser. However, a web page in Underwood does not have panels. Data storage is discussed, but no panels nor any equivalent or synonym are discussed, nor are actions. Underwood describes a WYSIWIG Panel area 4205 and a display panel 4235 (column 23).

However, these panels do not have a customized widget associated with them, or located in them, as claimed. Instead, these sections of Underwood explain how an Underwood user can visually make selections of the type of layout sought to be contained in the final product seen by the user, including such visual details as type of background, header, title, and other factors. Thus, these panels relate to Underwood's tool and not the finished user application. No suggestion is made about incorporating widgets or any equivalent.

Present claim 2 recites "the selected widget is arranged into a specified layout within the selected panel". Claims 1, 12, 13, 23, and 33 recite similar subject matter. In rejecting the claimed "widgets", the Office Action (page 5) relies on Bowman paragraph [3076]. The cited section of Bowman discusses widgets and how they interact with business components within an application window, but never discusses a widget in relationship to any panel (or equivalent), as claimed. A rejection cannot be supported properly by a citation to a reference that simply happens to use the same keyword as in the claim, because the mere presence of such a keyword would not "teach" a person of skill in the art how to make the claimed combination.

Regarding the claimed "controller that is communicatively coupled to one or more actions, widgets, and panels", the Office Action (page 5) relies on column 41 of Underwood. However, nothing in Underwood's column 41 corresponds to the claimed controller, and the Office Action fails to identify any particular element of Underwood that corresponds to the controller.

Claim 2 now recites "the controller determining which of the one or more actions is responsible for acting on the user request". Because Underwood does not have any discernible equivalent for the claimed "actions", and also does not discuss "acting on user requests", it is not possible for Underwood to contain an equivalent for a controller determining which of one or more actions is responsible for acting on user requests.

Claim 2 also recites "obtaining, using the actions, one or more parameter values from the business objects" and "associating, using the actions, the business object parameter values with a widget . . .". Claims 1, 12, 13, 23, and 33 recite similar subject matter. None of the elements

within the section of Underwood cited to correspond with the claimed “business objects” (e.g. predefined site definitions, templates, generic structures, content, and embedded applications) are described as having the ability to supply parameter values and associate those parameter values with a widget. The Office Action fails to identify any particular element corresponding to the claimed “business objects”.

Although not cited within the Office Action, Bowman states:

“GUI widgets are linked or bound to domain objects. Data access (and retrieval) for these objects is organized around the business entity, rather than a transaction, and so data is packaged into cross-functional objects, rather than transaction-specific data structures. Each business object manages the retrieval of its data items” (Bowman, paragraph [4404]).

Bowman fails to disclose business objects that are obtained using “actions” as claimed, and also does not disclose business objects being associated with a widget using “actions”, as claimed. Further, Bowman’s data objects do not correspond with the claimed parameter values from the business objects. Even if the claimed parameter values can be found somewhere within the various prior art references, neither Underwood nor Bowman disclose any equivalent for the claimed “associating the selected widget with a panel selected from the one or more panels, wherein the selected widget is arranged into a specified layout within the selected panel”. Bowman is entirely silent to panel selection.

Claim 2 also recites “wherein at least one of the widgets has the capability of representing properties of the business objects as HTML”. Claims 1, 12, 13, 23, and 33 recite similar subject matter. As stated, the Office Action (page 5) relies on Bowman to suggest the claimed widgets. However, Bowman never describes its widgets as representing anything in HTML, and Underwood does not discuss widgets at all.

Bowman actually **teaches away** from using HTML, instead recommending Java. Bowman states that “custom widgets can be created, and client-side performance can be improved. **Unlike HTML**, Java supports the notion of client-side validation, offloading

appropriate processing onto the client” (Bowman, paragraph [0256]), emphasis added). Bowman also states that HTML “has proven to be inadequate” and can only produce static web pages, has a lack of interoperability with existing applications and data, and also has an inability to scale (Bowman, paragraphs [0246]-[0251]).

Conversely, Applicant’s specification describes a web page generator enabling developers “to concentrate more on business logic layer, so that they need not repeat developing custom JSP’s for every project” (paragraph [00068], where JSP stands for Java Server Page). Applicant also states that “dynamic content manipulation means that the system uses a widget-based approach, rather than using custom tags in JSPs” (paragraph [0042]). Paragraph [0052] states that “typical JSP development . . . enhances readability and maintainability of JSP pages, the tags are processed by a JSP container and are not flexible enough to be manipulated programmatically, and are not suitable for dynamic generation of UI (e.g. the last step of Claim 2). Underwood and Bowman are examples of such “typical JSP development” and therefore have no relevance to the claims. Applicant states that “to overcome this limitation, web page generator 202 uses an approach based on widgets 210”. Accordingly, Claim 2 recites “associating, using the actions, the business object parameter values with a widget selected from among the one or more widgets; associating the selected widget with a panel selected from the one or more panels, wherein the selected widget is arranged into a specified layout within the selected panel.”

For at least the above reasons, the rejections of Claims 1, 2, 12, 13, 23, and 33 are unsupportable and should be withdrawn. The rejections of all dependent claims, which incorporate by reference at least one independent claim described above, are also unsupportable for the same reasons give above for the independent claims. Reconsideration is respectfully requested.

### III. CONCLUSIONS & MISCELLANEOUS

For the reasons set forth above, all of the pending claims are now in condition for allowance. The Examiner is respectfully requested to contact the undersigned by e-mail or

telephone relating to any issue that would advance examination of the present application. As per MPEP Chapter 5, Applicant acknowledges that Internet communications may not be secure.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a check for the petition for extension of time fee and other applicable fees is enclosed herewith. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

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